

RECEIVED
AND FILED

DLS

1 CA Construction
2 Chris McKinney
3 127 De Normandie Way
Martinez, CA 94553
(925) 917 - 0887
4 21techlife@gmail.com
Creditor, In Proper Person

2022 JUL 28 P 12:55

U.S. BANKRUPTCY COURT
MARY A. SCHOTT, CLERK

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

9 IN RE;) Case No.: BK-19-50103-gs
10 DORA DOG PROPERTIES, LLC) (Chapter 7)
11 DOG BLUE PROPERTIES, LLC) Response to Documents 680, 684
12 BRANDY BOY PROPERTIES)
13) Hearing Date: August 11, 2022
14) Hearing Time: 9:30 a.m.

15 **OPPOSITION TO TRUSTEE'S SECOND AMENDED OMNIBUS OBJECTION TO**
16 **PROOFS OF CLAIM**

17
18
19 CA CONSTRUCTION (CHRIS MCKINNEY), a creditor in this case, opposes the TRUSTEE
20 'S SECOND AMENDED OMNIBUS OBEJCTION TO PROOFS OF CLAIM, which was filed by
21 STEPHEN R. HARRIS, ESQ. of HARRIS LAW PRACTICE LLC, on behalf of W. DONALD
22 GIESEKE, the TRUSTEE in this case.
23
24

25 My opposition is based upon and supported by the following Memorandum of Points and
26 Authorities, the pleadings and papers on file with the Court, the attached declaration and exhibits, and
27 any argument the Court may allow at the time of hearing.
28

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2

3

4

5 I oppose THE TRUSTEE'S SECOND AMMENDED OMNIBUS OBJECTION TO PROOFS
6 OF CLAIM on file with the Court for the following reasons and based upon the facts, law, and legal
7 analysis below:

8

9

10 The debt owed me by the debtor(s) in this case is for work contracted with Dog Blue
11 Properties LLC and completed by me or others that were subcontracted and paid by me. Signed
12 Quotes, Contracts, and Invoices, as well as Checks written and signed by the Debtors, seized by
13 Federal Agents, clearly show the Debtors acknowledgement of their responsibility of this debt.

14

15

16

17 It appears that the Trustee is objecting to my Proof of Claim based on the Relation Back
18 Doctrine and the fact that the properties I performed work at were seized by the Federal Government.
19 This Objection is invalid as I contracted and performed work for Dog Blue Properties LLC as the
20 property manager, not as the owner of the real property. Whether the title of the properties was held
21 by the Debtor, The Federal Government, or any other 3rd party is irrelevant to the contracts written for
22 and signed by Priscilla Amato on behalf of Dog Blue Properties LLC as they were acting as the
23 property management company. Priscilla Amato introduced herself as having the title of Property
24 Manager. She is the only individual I had contact with, submitted quotes to, and the signer for all
25 contracts written for Dog Blue Properties LLC. Whether they owned the real property or held the title
26
27

1 is not in debate in this case as they were the acting property management company at the time she
2 signed the contracts for the work required to maintain, improve, prepare for rent, or otherwise manage
3 the properties at which I am owed compensation for my services. At no time did I know or check to
4 see who owned the properties I provided my services for as I, at no time was I under the impression
5 that I was working for the owners of these properties. The services I provided were to make the
6 properties able to be legally rented or sold at a fair market value. These services were necessary
7 regardless of who owned or managed the properties.
8
9

10
11
12 Respectfully Submitted,
13
14

15 DATED this 25th day of August 2022.
16
17
18
19 By: CHRIS MCKINNEY / CA CONSTRUCTION
20 Creditor, In Proper Person
21
22
23
24
25 I declare under penalty of perjury under the law of the State
26 of Nevada that the foregoing is true and correct.
27
28



CERTIFICATE OF SERVICE

**I HEREBY CERTIFY that on August 26, 2022, I served the above OPPOSITION TO
TRUSTEE'S SECOND AMENDED OMNIBUS OBJECTION TO PROOF OF CLAIMS**

by email to the persons and email address listed below:

STEPHEN R. HARRIS

HARRIS LAW PRACTICE LLC

steve@harrislawreno.com

Respectfully Submitted,

DATED this 25th day of August, 2022.

By: CHRIS MCKINNEY (CA CONSTRUCTION)

Creditor, In Proper Person

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.